

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

RONALD A. KATZ TECHNOLOGY LICENSING, L.P.,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 1:07-cv-00361-GMS
)	
COMCAST CORPORATION; COMCAST CABLE COMMUNICATIONS, LLC;)	
COMCAST OF NEW CASTLE COUNTY, LLC;)	JURY TRIAL DEMANDED
COMCAST OF DELMARVA, INC.;)	
COMCAST OF EASTERN SHORE, LLC;)	
COMCAST OF CALIFORNIA II, LLC;)	
COMCAST OF CALIFORNIA/COLORADO, LLC; COMCAST OF ARKANSAS/FLORIDA/)	
LOUISIANA/MINNESOTA/MISSISSIPPI/)	
TENNESSEE, INC.; COMCAST OF COLORADO/PENNSYLVANIA/WEST)	
VIRGINIA, LLC; COMCAST OF FLORIDA/ ILLINOIS/MICHIGAN, INC.; COMCAST OF)	
GARDEN STATE, L.P.; COMCAST OF HOUSTON, LLC; GEICO CORPORATION;)	
GOVERNMENT EMPLOYEES INSURANCE COMPANY; GEICO GENERAL INSURANCE)	
COMPANY; GEICO INDEMNITY COMPANY;)	
GEICO CASUALTY COMPANY; XM)	
SATELLITE RADIO HOLDINGS, INC.;)	
XM SATELLITE RADIO, INC.; XM RADIO, INC. and XM EQUIPMENT LEASING, LLC,)	
)	
Defendants.)	

**THE GEICO DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT OR,
ALTERNATIVELY, FOR A MORE DEFINITE STATEMENT**

Defendants Geico Corporation, Government Employees Insurance Company, Geico General Insurance Company, and Geico Indemnity Company (collectively "Geico Defendants"), hereby move pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, to dismiss Count II of Plaintiff Ronald A. Katz Technology Licensing, L.P.'s Amended Complaint for Patent

Infringement for failure to state a claim upon which relief may be granted. In the alternative, the Geico Defendants hereby move pursuant to Rule 12(e) of the Federal Rules of Civil Procedure for a more definite statement of Katz's claims.

The Court is respectfully referred to the accompanying brief for the reasons advanced in support of this motion.

Respectfully submitted,

FOX ROTHSCHILD LLP

By: /s/ Francis G.X. Pileggi

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GEICO CORPORATION, GOVERNMENT
EMPLOYEES INSURANCE COMPANY, GEICO
GENERAL INSURANCE COMPANY, GEICO
INDEMNITY COMPANY AND GEICO
CASUALTY COMPANY

Dated: August 22, 2007

CERTIFICATE OF SERVICE

I, Francis G. X. Pileggi, Esquire, hereby certify on this 22nd day of August 2007, that the Geico Defendants' Motion to Dismiss Plaintiff's Complaint or, Alternatively, for a More Definite Statement has been served with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following:

Andre G. Bouchard, Esq.
John M. Seaman, Esq.
Bouchard Margules & Friedlander, P.A.
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/s/ Francis G.X. Pileggi
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